

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

MCGRAW HILL LLC; BEDFORD, FREEMAN &
WORTH PUBLISHING GROUP, LLC d/b/a
MACMILLAN LEARNING; CENGAGE
LEARNING, INC.; ELSEVIER INC.; and
PEARSON EDUCATION, INC.;

Plaintiffs,

v.

DOES 1 - 63 d/b/a 1STEBOOKS.COM,
AONIE.CLUB, AQUICKSHOP.ONLINE,
ATISO.CLUB, BIGDADYSTORES.COM,
BOOKSCHEAP.ORG,
BOOKSPERSONALLY.COM,
CAPOSEL.MYSHOPIFY.COM, CCBOOKS.ORG,
COLLEGE2BOOK.COM,
DERORA.ONKINGSHOP.COM,
DIGITALBOOK4YOU.COM,
DIGITALBOOKDRIVE.COM, DUMANUS.COM,
EBOOK4MART.COM, EBOOKALL.STORE,
EBOOKANDLIFE.COM, EBOOK-MALL.COM,
EBOOKMAR.COM, EBOOKSMODA.COM,
EBOOKSSHelf.COM, EBOOKSSTUFF.CO,
EBOOKTESTBANK.COM,
EBOOKTHINGS.NET, EBOOKTODAY.NET,
EBOOKTODAY.STORE, EBOOKUS.STORE,
EBOOKVIP.STORE,
ENENT.MYSHOPIFY.COM,
EVELYN.ONKINGSHOP.COM,
FALCOUS.MYSHOPIFY.COM,
GENTER.STORE, GETXT.NET,
GILDANVIETNAM.COM,
GOLDENBUUKS.MYSHOPIFY.COM,
GRUTINA.SHOP, GUZGUZ.CLUB,
IBOOKSTOREHUB.COM, ICONOVER.COM,
INTELLIGENTLEARNERCLUB.COM,
LLERSAND.XYZ, MEGAEBooks.INFO,
MONONUS.COM, MOSAC.CLUB,
MUTRIM.MYSHOPIFY.COM,
MYMOMOXSTORE.MYSHOPIFY.COM,
NIGHIGIFT.COM, PDF4COLLEGES.COM,

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 9/9/2020

Civil Action No. 1:20-cv-6368-GHW

PRELIMINARY INJUNCTION

PDF4SCHOOL.COM, PENNYMAC.CLUB,
PIXAREBOOK.STORE,
RELIABLEOUTLETS.COM, RUZSSOS.XYZ,
SEKO.CLUB, STDBOOKS.COM,
SUGISE.MYSHOPIFY.COM,
UNIBOOKMASTER.COM, VITALEBOOK.NET,
VITALEBOOK.STORE, WEBBOOK.STORE,
WEYCO.CLUB, ZBOOKLIFE.COM, and
ZSTAPLESS.COM,

Defendants.

Plaintiffs McGraw Hill LLC, Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning, Cengage Learning, Inc., Elsevier Inc., and Pearson Education, Inc. (collectively, “Plaintiffs”) have moved for a Preliminary Injunction against Defendants Does 1 – 63 (collectively, “Defendants”), doing business as, respectively, 1stebooks.com, aonie.club, aquickshop.online, atiso.club, bigdadystores.com, bookscheap.org, bookspersonally.com, caposel.myshopify.com, ccbooks.org, college2book.com, derora.onkingshop.com, digitalbook4you.com, digitalbookdrive.com, dumanus.com, ebook4mart.com, ebookall.store, ebookandlife.com, ebook-mall.com, ebookmar.com, ebooksmoda.com, ebookssshelf.com, ebooksstuff.co, ebooktestbank.com, ebookthings.net, ebooktoday.net, ebooktoday.store, ebookus.store, ebookvip.store, enent.myshopify.com, evelyn.onkingshop.com, falcouz.myshopify.com, genter.store, getxt.net, gildanvietnam.com, goldenbuuks.myshopify.com, grutina.shop, guzguz.club, ibookstorehub.com, iconover.com, intelligentlearnerclub.com, llersand.xyz, megaebooks.info, mononus.com, mosac.club, mutrim.myshopify.com, mymomoxstore.myshopify.com, nghigift.com, pdf4colleges.com, pdf4school.com, pennymac.club, pixarebook.store, reliableoutlets.com, ruzssos.xyz, seko.club, stdbooks.com, sugise.myshopify.com, unibookmaster.com, vitalebook.net, vitalebook.store, webbook.store, weyco.club, zbooklife.com, and zstapless.com (the “Infringing Sites”). Plaintiffs so move on the

basis that Defendants are reproducing and/or distributing unauthorized electronic copies of Plaintiffs' copyrighted textbooks and using in commerce unauthorized identical (or substantially indistinguishable) copies of Plaintiffs' federally registered trademarks, as set forth in Plaintiffs' Complaint.

The Court, having reviewed the Complaint, the Memorandum of Law in Support of Plaintiffs' Application for a Temporary Restraining Order, Order to Show Cause Why a Preliminary Injunction Should Not Issue, Expedited Discovery Order, and Alternate Service Order ("the Application") (ECF No. 17), the supporting declarations (ECF Nos. 18-24), and the entire record herein, makes the following findings of fact and conclusions of law:

1. Plaintiffs have served Defendants with the Complaint and the exhibits thereto, the Court's August 12, 2020 *Ex Parte* Order ("the *Ex Parte* Order") (ECF No. 5) granting the Application, and the other papers filed in this case as set forth in the Certificates of Service filed by Plaintiffs on September 1 and 4, 2020 (ECF Nos. 9 & 32).
2. Plaintiffs have made a *prima facie* showing that the Court has personal jurisdiction over Defendants under N.Y. C.P.L.R. § 302(a). Plaintiffs have asserted that Defendants have distributed, advertised, offered to sell, and sold unauthorized electronic copies of Plaintiffs' copyrighted textbooks ("Infringing eBooks"), including those that bear unauthorized copies of Plaintiffs' trademarks, through highly interactive websites that are continuously accessible to New York consumers, and that Plaintiffs have been injured in New York by Defendants' infringing conduct.
3. Plaintiffs are likely to succeed in showing that Defendants have infringed and are continuing to infringe Plaintiffs' federally registered copyrights and trademarks in connection with Defendants' reproduction, distribution, offering for sale, and/or sale of Infringing eBooks as set

forth on Exhibits B and C to the Complaint, which are attached hereto as **Appendices A and B**, respectively.

4. The reproduction, distribution, advertisement, offering for sale, and/or sale of Infringing eBooks will result in immediate and irreparable injury to Plaintiffs if the requested relief is not granted.

5. The balance of potential harm to Defendants, if any, by being prevented from continuing to profit from their illegal and infringing activities if a Preliminary Injunction is issued is far outweighed by the harm to Plaintiffs, their businesses, and the value associated with Plaintiffs' copyrights and trademarks if a Preliminary Injunction is not issued.

6. Public interest favors issuance of a Preliminary Injunction in order to protect Plaintiffs' interests in and to their respective copyrights and trademarks and protect the public from being deceived and defrauded by Defendants' infringing conduct.

NOW, THEREFORE, IT IS HEREBY ORDERED, in accordance with Federal Rules of Civil Procedure 64 and 65, the Copyright Act (17 U.S.C. § 502(a)), the Lanham Act (15 U.S.C. § 1116(a)), N.Y. C.P.L.R. §§ 6201 *et al.*, and the Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, that:

1. Defendants, their officers, agents, servants, employees, and attorneys, and all those in active concert or participation with any of them who receive actual notice of this Preliminary Injunction, are enjoined from:

a) Directly or indirectly infringing any copyrighted work that is owned or exclusively controlled by any of the Plaintiffs ("Plaintiffs' Textbooks"), including any copyrighted work published under any of the imprints identified on **Appendix C** hereto ("the Imprints");

- b) Directly or indirectly infringing any trademark that is owned or exclusively controlled by any of the Plaintiffs (“Plaintiffs’ Marks”), including such trademarks associated with the Imprints;
- c) Directly or indirectly copying, reproducing, manufacturing, downloading, uploading, transmitting, distributing, selling, offering for sale, advertising, marketing, promoting, or otherwise exploiting any of Plaintiffs’ Textbooks or goods bearing Plaintiffs’ Marks without Plaintiffs’ express written authorization;
- d) Using, hosting, operating, maintaining, creating, or registering any computer server, website, domain name, domain name server, cloud storage, e-commerce platform, online advertising service, social media platform, proxy service (including reverse and forwarding proxies), website optimization service (including website traffic management), caching service, content delivery network, payment processing service, in each case in connection with the Infringing Sites, or providing any other service that supports the Infringing Sites in a similar manner as the above-listed services to enable, facilitate, permit, assist, solicit, encourage, or induce the infringement of Plaintiffs’ Textbooks or Plaintiffs’ Marks on the Infringing Sites, as set forth in subparagraphs (a) through (d) above;
- e) Transferring ownership or control of the websites, domain names, or accounts associated with the Infringing Sites; and
- f) Displaying the Infringing Sites in online search results and/or listing links to the Infringing Sites in any search index.

2. Defendants, their officers, agents, servants, employees, and attorneys, and all those in active concert or participation with any of them who receive actual notice of this Preliminary Injunction, and service providers to Defendants or other third parties who receive actual notice of this Preliminary Injunction and operate or control accounts holding or receiving money or other assets owned by, related to, connected to, associated with, held by, or transferred in connection with the Infringing Sites (“Defendants’ Accounts”), must immediately locate all Defendants’ Accounts and immediately cease transferring, withdrawing, or otherwise disposing of any money or other assets in Defendants’ Accounts or allowing such money or other assets in Defendants’ Accounts to be transferred, withdrawn, or otherwise disposed of. Defendants’ Accounts include but are not limited to: (i) Defendants’ accounts with PayPal, Stripe, Square, Shopify, and other providers of payment processing services; and (ii) Defendants’ accounts with banks, savings and loan associations, credit card processing agencies, merchant acquiring banks, and other companies that engage in the processing or transfer of money and/or other assets that have received money or other assets from Defendants’ Accounts or otherwise received sales proceeds from the Infringing Sites.

IT IS FURTHER ORDERED that Defendants shall preserve copies of all computer files relating to any of the Infringing Sites and shall take all steps necessary to retrieve computer files relating to the Infringing Sites that may have been deleted before the entry of this Order.

IT IS FURTHER ORDERED that the Expedited Discovery Order contained in the *Ex Parte* Order shall remain in effect until further order of the Court.

IT IS FURTHER ORDERED that this Preliminary Injunction shall no longer apply to any Defendant dismissed from this action.

IT IS FURTHER ORDERED that Plaintiffs shall serve this order on Defendants and file proof of service on the docket.

SO ORDERED.

Dated: September 9, 2020
New York, New York



GREGORY H. WOODS
United States District Judge

APPENDIX A

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COMPLAINT EXHIBIT B

Count	Publisher	Title	Registration Number	Infringing Site
1	Cengage	American Government and Politics Today: Brief Edition 2014-2015	TX0007896428	stdbooks.com
2	Cengage	American Government Institutions and Policies, 12th	TX0008022505	zbooklife.com
3	Cengage	American Government: Institutions and Policies, 14th	TX0007939912	lebookmar.com
4	Cengage	An Introduction to Mechanical Engineering, 3rd	TX0007479630	1stebooks.com
5	Cengage	Brief Principles of Macroeconomics, 9th	TX0008827856	genter.store
6	Cengage	Business Law Principles and Practices, 9th	TX0007690847	unibookmaster.com
7	Cengage	Business Law: The First Course Summarized Case, 14th	TX0008377845	laquickshop.online
8	Cengage	Business Law: The First Course Summarized Case, 14th	TX0008377845	caposel.myshopify.com
9	Cengage	Calculus: Early Transcendentals, 6th	TX0006593776	levelyn.onkingshop.com
10	Cengage	Calculus: Early Transcendentals, 6th	TX0006593776	inghigift.com
11	Cengage	Case Studies in Health Information Management, 3rd	TX0008525856	lebookvip.store
12	Cengage	Contemporary Auditing, 9th	TX0007478248	lebookus.store
13	Cengage	Culture Counts: A Concise Introduction To Cultural Anthropology, 4th	TX0008396024	derora.onkingshop.com
14	Cengage	Culture Counts: A Concise Introduction To Cultural Anthropology, 4th	TX0008396024	pdf4colleges.com
15	Cengage	Elements of Modern Algebra, 8th	TX0007817856	lebooktestbank.com
16	Cengage	Essentials of Abnormal Psychology, 8th	TX0008559696	megaebooks.info
17	Cengage	Foundations of Marketing, 8th	TX0008702724	bigdadvstores.com
18	Cengage	Income Tax Fundamentals 2020	TX0008768237	lebooksmoda.com
19	Cengage	Mathematical Statistics with Applications, 7th	TX0006818719	vitalebook.store
20	Cengage	Microsoft Excel 2013	TX0007721909	ccbooks.org
21	Cengage	Physics for Scientists and Engineers with Modern Physics, 9th	TX0007700143	lebook-mall.com
22	Cengage	Public Finance, 10th	TX0006835020	bookscheap.org
23	Cengage	The Brief Cengage Handbook, 8th	TX0007475593	lebookandlife.com
24	Cengage	Understanding Computers: Today And Tomorrow, Comprehensive, 15th	TX0007897274	bookspersonally.com
25	Elsevier	Alexander's Care of the Patient in Surgery, 16th	TX0007901280	stdbooks.com
26	Elsevier	Atlas of Human Anatomy, 7th	TX0007923896	mononus.com
27	Elsevier	Atlas of Human Anatomy, 7th	TX0007923896	zstapless.com
28	Elsevier	Atlas of Human Anatomy, 7th	TX0007923896	dumanus.com
29	Elsevier	Clinical Nursing Skills and Techniques, 8th	TX0007718778	vitalebook.store
30	Elsevier	Clinical Nursing Skills and Techniques, 8th	TX0007718778	inghigift.com
31	Elsevier	Community/Public Health Nursing: Promoting the Health of Populations, 7th	TX0008709490	intelligentlearnerclub.com
32	Elsevier	Differential Diagnosis for Physical Therapists: Screening for Referral, 6th	TX0007572663	lebookshelf.com
33	Elsevier	Health Promotion Throughout the Life Span, 9th	TX0007172225	gildanvietnam.com
34	Elsevier	Hematology: Basic Principles and Practice, 7th	TX0007729570	laquickshop.online
35	Elsevier	HESI Comprehensive Review for the NCLEX-RN Examination, 4th	TX0007587706	lebook-mall.com
36	Elsevier	Nursing Interventions Classification (NIC), 6th	TX0007710947	iconover.com
37	Elsevier	Pharmacology: A Patient-Centered Nursing Process Approach, 10th	TX0008406812	lebookus.store
38	Elsevier	Prioritization, Delegation, and Assignment, 4th	TX0007847435	lebookvip.store
39	Elsevier	Review of Surgery for ABSITE and Boards, 2nd	TX0008424201	lebookmar.com
40	Elsevier	Wong's Nursing Care of Infants and Children, 11th	TX0007332889	genter.store
41	Macmillan Learning	Abnormal Psychology, 10th	TX0008610008	mononus.com
42	Macmillan Learning	A Pocket Guide to Public Speaking, 6th	TX0008218119	lebookshelf.com
43	Macmillan Learning	Biochemistry A Short Course, 3rd	TX0008134104	unibookmaster.com
44	Macmillan Learning	Current Issues And Enduring Questions, 11th	TX0008352402	derora.onkingshop.com
45	Macmillan Learning	From Inquiry to Academic Writing: A Practical Guide, 4th	TX0008012266	lebookvip.store
46	Macmillan Learning	Lehninger Principles of Biochemistry, 7th	TX0008415420	stdbooks.com
47	Macmillan Learning	Media and Culture, 11th	TX0008492636	stdbooks.com
48	Macmillan Learning	Pocket Style Manual, 8th	TX0008525413	sekoclub
49	Macmillan Learning	Pocket Style Manual, 8th	TX0008525413	caposel.myshopify.com
50	Macmillan Learning	Psychology in Everyday Life ,3rd	TX0007882326	genter.store
51	Macmillan Learning	Psychology in Everyday Life, 4th	TX0008496502	laquickshop.online
52	Macmillan Learning	Psychology in Everyday Life, 4th	TX0008496502	inghigift.com
53	Macmillan Learning	Psychology in Modules, 11th	TX0008057951	lebookthings.net
54	Macmillan Learning	Psychology, 12th	TX0008554016	evelyn.onkingshop.com
55	Macmillan Learning	Reading Critically Writing Well, 11th	TX0008378312	mosac.club
56	Macmillan Learning	Reading Critically, Writing Well, 11th	TX0008378312	latiso.club
57	McGraw Hill	5 Steps to a 5: AP Biology, 2017	TX0007955829	goldenbuks.myshopify.com
58	McGraw Hill	A Wellness Way of Life, 11th	TX0007301178	ruzzos.xyz
59	McGraw Hill	Aging and the Life Course An Introduction to Social Gerontology, 7th	TX0008733233	reliableoutlets.com
60	McGraw Hill	Aging and the Life Course An Introduction to Social Gerontology, 7th	TX0008733233	inghigift.com
61	McGraw Hill	Aging and the Life Course An Introduction to Social Gerontology, 7th	TX0008733233	caposel.myshopify.com
62	McGraw Hill	Analysis for Financial Management, 11th	TX0007507514	getxt.net
63	McGraw Hill	Auditing and Assurance Services, 7th	TX0008727541	bookscheap.org
64	McGraw Hill	College English and Business Communication, 11th	TX0008611167	lebookshelf.com
65	McGraw Hill	Communicating at Work, 12th	TX0008590200	mymomoxstore.myshopify.com
66	McGraw Hill	Crafting and Executing Strategy: Concepts and Readings, 20th	TX0007710270	laquickshop.online
67	McGraw Hill	Cunningham And Gilstrap's Operative Obstetrics, 3rd	TX0008608942	digitalbookdrive.com
68	McGraw Hill	Drugs, Society, and Human Behavior, 17th	TX0008733303	weyco.club
69	McGraw Hill	Economics, 21st	TX0008036520	mononus.com
70	McGraw Hill	Essentials of Contemporary Management, 7th	TX0008544280	lebook-mall.com
71	McGraw Hill	Essentials of Corporate Finance, 9th	TX0008349025	stdbooks.com
72	McGraw Hill	Ethical Obligations and Decision-Making in Accounting Text and Cases, 5th	TX0008727846	unibookmaster.com
73	McGraw Hill	Financial Shenanigans: How to Detect Accounting Gimmicks & Fraud in Financial Reports, 3rd	TX0007172429	lebooktoday.store
74	McGraw Hill	Managerial Accounting: Creating Value in a Dynamic Business Environment, 10th	TX0007810339	lebookmar.com
75	McGraw Hill	Microbiology Demystified, 1st	TX0006194446	ccbooks.org
76	McGraw Hill	Microbiology Fundamentals: A Clinical Approach, 3rd	TX0008570104	genter.store
77	McGraw Hill	Organic Chemistry with Biological Topics, 5th	TX000860573	lebooktoday.net
78	McGraw Hill	Personal Finance, 10th	TX0007726350	evelyn.onkingshop.com

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COMPLAINT EXHIBIT B

Count	Publisher	Title	Registration Number	Infringing Site
79	McGraw Hill	Public Finance, 10th	TX0007786922	enent.myshopify.com
80	McGraw Hill	Shigley's Mechanical Engineering Design, 11th	TX0008710906	ebookall.store
81	McGraw Hill	The Art of Public Speaking, 12th	TX0008003528	vitalebook.store
82	McGraw Hill	Understanding Business: The Core	TX0008385133	ebooksstuff.co
83	McGraw Hill	Understanding Business: The Core	TX0008385133	ebookus.store
84	McGraw Hill	Workbook For Tonal Harmony, 8th	TX0008158255	derora.onkingshop.com
85	Pearson	A Graphical Approach to Algebra & Trigonometry, 7th	TX0007853036	enent.myshopify.com
86	Pearson	A Graphical Approach to Algebra & Trigonometry, 7th	TX0007853036	falcous.myshopify.com
87	Pearson	A Graphical Approach to Algebra & Trigonometry, 7th	TX0007853036	caposel.myshopify.com
88	Pearson	A Graphical Approach to Algebra & Trigonometry, 7th	TX0007853036	mutrlm.myshopify.com
89	Pearson	A Graphical Approach to Precalculus with Limits, 7th	TX0007883378	ibookstorehub.com
90	Pearson	A Pathway to Introductory Statistics, 2nd	TX0008184355	sugise.myshopify.com
91	Pearson	A Short Guide to Writing about Biology, 9th	TX0008050862	aquickshop.online
92	Pearson	Architecture: From Prehistory To Postmodernity, 2nd	TX00081855975	derora.onkingshop.com
93	Pearson	Auditing and Assurance Services, 16th	TX0008382072	grutina.shop
94	Pearson	Biology Of Humans: Concepts, Applications, And Issues, 6th	TX0008241495	digitalbook4you.com
95	Pearson	Building a Digital Analytics Organization, 1st	TX0007884161	ebookvip.store
96	Pearson	Campbell Biology in Focus, 2nd	TX0008217662	bookscheap.org
97	Pearson	Campbell Biology, 10th	TX0008307770	webbook.store
98	Pearson	Campbell Biology, 10th	TX0008307770	nghigift.com
99	Pearson	Campbell Biology, 11th	TX0008472354	college2book.com
100	Pearson	Campbell Biology, 11th	TX0008472354	pixarebook.store
101	Pearson	Campbell Biology, 11th	TX0008472354	unibookmaster.com
102	Pearson	Campbell Biology, 8th	TX0007883763	ebook4mart.com
103	Pearson	Clinical Laboratory Chemistry, 2nd	TX0008514379	llersand.yz
104	Pearson	Computer Security Fundamentals, 2nd	TX0007500873	ebooktoday.store
105	Pearson	Electrical Engineering: Principles and Applications, 6th	TX0007711377	ebookmar.com
106	Pearson	Elementary Statistics Using Excel, 6th	TX0008529894	evelyn.onkingshop.com
107	Pearson	Elementary Statistics Using Excel, 6th	TX0008529894	pdf4school.com
108	Pearson	Foundations of Addictions Counseling, 3rd	TX0008088495	ebookus.store
109	Pearson	Foundations of Addictions Counseling, 3rd	TX0008088495	stdbooks.com
110	Pearson	Hornsgren's Accounting, 12th	TX0008464965	pennymac.club
111	Pearson	Human Anatomy & Physiology Laboratory Manual, 12th	TX0008057720	aonie.club
112	Pearson	Project Management, 4th	TX0008106430	vitalebook.net
113	Pearson	Social Psychology, 10th	TX0008126280	guzguz.club
114	Pearson	Strategic Communication in Business and the Professions, 8th	TX0008183992	ebookshelf.com
115	Pearson	Technical Communication Today, 6th (IRC)	TX0008458282	vitalebook.store
116	Pearson	Technical Communication, 14th	TX0008512005	ebook-mall.com

APPENDIX B

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COMPLAINT EXHIBIT C - TRADEMARKS INFRINGED

Count	Plaintiff	Trademark(s)	Trademark Registration(s)	Defendant(s)
1	Cengage	Cengage Learning	3,603,376	Doe 1 Doe 3 Doe 7 Doe 8 Doe 9 Doe 11 Doe 15 Doe 18 Doe 19 Doe 23 Doe 48 Doe 55 Doe 62
2	Cengage	Cengage	3,603,349	Doe 5 Doe 20 Doe 28 Doe 32 Doe 42
3	Cengage	Brooks/Cole	3,386,242	Doe 15 Doe 30 Doe 47 Doe 59
4	Cengage	Course Technology	1,660,331	Doe 9
5	Cengage	South-Western	3,493,849	Doe 6 Doe 57
6	Cengage		3,790,579	Doe 1 Doe 3 Doe 5 Doe 7 Doe 8 Doe 11 Doe 15 Doe 18 Doe 19 Doe 20 Doe 32 Doe 42 Doe 48 Doe 62

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COMPLAINT EXHIBIT C - TRADEMARKS INFRINGED

Count	Plaintiff	Trademark(s)	Trademark Registration(s)	Defendant(s)
7	Elsevier	Elsevier	749,444	Doe 3 Doe 14 Doe 15 Doe 19 Doe 21 Doe 27 Doe 28 Doe 32 Doe 34 Doe 39 Doe 40 Doe 43 Doe 47 Doe 55 Doe 59 Doe 63
8	Macmillan Learning	Macmillan Learning	5,599,332	Doe 3 Doe 4 Doe 8 Doe 11 Doe 21 Doe 28 Doe 30 Doe 43 Doe 44 Doe 47 Doe 54 Doe 55
9	Macmillan Learning	Macmillan	969,205	Doe 24
10	McGraw Hill	McGraw Hill	2,899,528	Doe 9 Doe 26 Doe 30

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COMPLAINT EXHIBIT C - TRADEMARKS INFRINGED

Count	Plaintiff	Trademark(s)	Trademark Registration(s)	Defendant(s)
11	McGraw Hill	McGraw Hill Education	4,664,267	Doe 3 Doe 6 Doe 8 Doe 11 Doe 13 Doe 15 Doe 17 Doe 19 Doe 21 Doe 22 Doe 25 Doe 27 Doe 32 Doe 33 Doe 35 Doe 43 Doe 46 Doe 47 Doe 52 Doe 53 Doe 55 Doe 57 Doe 59 Doe 61
12	Pearson		5,130,854	Doe 2 Doe 8 Doe 10 Doe 29 Doe 30 Doe 31 Doe 37 Doe 38 Doe 41 Doe 45 Doe 49 Doe 50 Doe 51 Doe 56 Doe 57 Doe 59

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COMPLAINT EXHIBIT C - TRADEMARKS INFRINGED

Count	Plaintiff	Trademark(s)	Trademark Registration(s)	Defendant(s)
13	Pearson	Pearson	2,599,724 2,600,081 2,652,792 2,679,355 2,691,830	Doe 3 Doe 6 Doe 8 Doe 10 Doe 12 Doe 15 Doe 16 Doe 19 Doe 21 Doe 26 Doe 27 Doe 29 Doe 30 Doe 31 Doe 36 Doe 37 Doe 38 Doe 45 Doe 47 Doe 49 Doe 50 Doe 51 Doe 55 Doe 56 Doe 57 Doe 58

Appendix C: Plaintiffs' Imprints

Cengage Learning	Macmillan Learning
Brooks Cole Cengage Cengage Learning Course Technology Delmar Gale Heinle Milady National Geographic Learning South-Western Educational Publishing Wadsworth	Bedford, Freeman & Worth High School Publishers Bedford/St. Martin's BFW BFW High School Publishers Freeman Macmillan Learning W.H. Freeman & Company Worth Worth Publishers
Elsevier	
Academic Cell Academic Press Amirsys Butterworth Heinemann Digital Press Elsevier Gulf Professional Publishing Hanley & Belfus Knovel Made Simple Books	Medicine Publishing Morgan Kaufmann Publishers Mosby Newnes North Holland Saunders Urban & Fischer William Andrew Woodhead Publishing
McGraw Hill	
Irwin Lange McGraw-Hill McGraw-Hill Education McGraw-Hill Higher Education McGraw-Hill Professional McGraw-Hill Ryerson McGraw-Hill/Appleton & Lange McGraw-Hill/Contemporary McGraw-Hill/Dushkin McGraw-Hill/Irwin McGraw Hill NTC/Contemporary Osborne Schaum's	Addison Wesley Adobe Press Allyn & Bacon Benjamin Cummings Brady Cisco Press Financial Times Press/FT Press IBM Press Longman New Riders Press Peachpit Press Pearson Pearson Education Que Publishing Sams Publishing
Pearson	